

HEAVY OFF-ROAD MOUNTED MANEUVER TRAINING AREA (HOMMTA) ENVIRONMENTAL IMPACT STATEMENT (EIS) RECORD OF DECISION (ROD)

1.0 Summary

As the Installation Management Command G4 Director, I have reviewed the proposed HOMMTA at Fort Benning, Georgia Final EIS. The Final EIS, prepared in compliance with the Council on Environmental Quality's (CEQ) Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act of 1969 (NEPA) (40 Code of Federal Regulations [CFR] 1500-1508) and the Army NEPA Regulation (32 CFR 651), adequately assesses the impacts on the natural and human environment of implementing the proposed HOMMTA and is incorporated by reference. As explained within this ROD, **the Army selects Alternative 1 (the Preferred Alternative) for implementation.**

2.0 Background

Fort Benning serves a critical role in supporting the Army's overarching mission. As the Army's Maneuver Center of Excellence (MCoE), the home of the Army's Armor and Infantry Schools, Fort Benning must support the institutional training of Infantry and Armor soldiers and leaders. The institutional training conducted at Fort Benning provides Army leaders with the opportunity to respond to a wide variety of situations that they can expect to encounter on the modern battlefield. Fort Benning is also home to several deployable tenant units that conduct off-road mounted maneuver training, including the 1st Security Force Assistance Brigade, Task Force 1-28 Infantry, and elements of the 75th Ranger Regiment.

Fort Benning must be able to train and develop highly skilled soldiers and leaders capable of conducting operations across the full spectrum of potential conflicts. Inherent in and vital to training Infantry and Armor soldiers and leaders properly is the requirement to provide sufficient heavy off-road mounted maneuver training area. Currently, the only training area at Fort Benning suitable for heavy off-road mounted maneuver training is the Good Hope Maneuver Training Area (GHMTA).

Since the initial development of the GHMTA, the Army’s training strategy has changed to “cross-domain movement and maneuver” that requires additional contiguous area for heavy off-road maneuver. In an attempt to accommodate this requirement, the Army continued to improve the off-road maneuver area within the GHMTA. Despite these improvements, the GHMTA landscape contains slopes, streams, wetlands, and other limitations that cannot support the increased maneuver training requirements of the MCoE and Fort Benning’s tenant units. As such, Fort Benning proposes to construct a HOMMTA with sufficient contiguous area to enable all units and courses to complete required cross-domain movement and maneuver training.

3.0 Purpose and Need for the Proposed Action

The purpose of the Proposed Action is to provide Fort Benning with a HOMMTA consistent with the current training requirements of the MCoE and Fort Benning’s tenant units. The Proposed Action is needed to address the lack of sufficient contiguous off-road mounted maneuver area to meet training requirements for heavy armor vehicle off-road maneuver training at Fort Benning.

4.0 Proposed Action and Alternatives

The Army proposed to construct, operate, and maintain a HOMMTA of at least 2,400 contiguous acres at Fort Benning, which will be large enough to conduct realistic training in accordance with Army training requirements. Construction will primarily include vegetation removal and installation of tank trails, culverted water crossings, and road upgrades, as well as burying existing overhead utilities. Operation will entail up to approximately 24 armor vehicles (i.e., tanks), with support vehicles in the area, maneuvering throughout designated portions of the HOMMTA in force-on-force training exercises. Light maneuver and other non-live-fire training exercises will also occur within the HOMMTA when it is not being used for heavy maneuver. Maintenance activities will largely be focused on preventing and addressing soil disturbance and the consequent potential for erosion and sedimentation, as well as monitoring water crossings, tank trails, and other infrastructure within the HOMMTA. Heavy maneuver training within the GHMTA will continue, at a reduced level, even when the HOMMTA is established.

During all phases of the Proposed Action, the Army will implement regulatory compliance measures (RCMs) and environmental protection measures (EPMs) that will proactively reduce

potential adverse environmental impacts. These RCMs and EPMs, listed in Table 2.1-1 of the Final EIS, are considered part of the Proposed Action, not separate mitigation measures.

The Army identified three reasonable Action Alternatives that would meet the purpose of and need for the Proposed Action; these three Action Alternatives (i.e., three distinct locations on Fort Benning where a HOMMTA could be constructed) were analyzed in detail in the Final EIS.

1. **Alternative 1 (Preferred Alternative): Northern Mounted Maneuver Training Area Alternative:** This alternative includes approximately 4,724 acres and is located adjacent to and east of the current Northern Maneuver Training Area and west of and near Fort Benning's Digital Multi-Purpose Range Complex.
2. **Alternative 2: Red Diamond Alternative:** This alternative includes approximately 3,744 acres and is located south of the Southern Maneuver Training Area (SMTA) near the Installation's southern boundary.
3. **Alternative 3: Eastern Boundary Alternative:** This alternative includes approximately 2,405 acres and is located between the northern duded impact area and the Installation's eastern boundary.

The Army also conducted a detailed study of the No Action Alternative in the Final EIS. While the No Action Alternative would not satisfy the purpose of or need for the Proposed Action, this Alternative was retained to provide a comparative baseline against which to analyze the effects of the Action Alternatives as required under the CEQ's NEPA Regulation.

5.0 Environmental Consequences

The Final EIS presents a detailed analysis of potential impacts that could occur to Valued Environmental Components (VECs) within their resource-specific Regions of Influence (ROI) under each Alternative (see Table 1). VECs studied in detail in the Final EIS include land use (recreation), air quality, noise, soils and topography, water resources, biological resources, cultural resources, socioeconomics, infrastructure, and hazardous and toxic materials and waste (HTMW). The impact analysis for these VECs included all reasonably foreseeable potential adverse and beneficial, short-term and long-term, and direct, indirect, and cumulative impacts.

Table 1: Comparative Analysis of Impacts Between the Alternatives

Key:

Green = Beneficial impact	Red = Significant adverse impact
Yellow = Negligible to minor adverse impact	Bolded impacts = greater impact among the Alternatives with same impact determination
Orange = Moderate adverse impact	<i>Italicized impacts</i> = lower impact among the Alternatives with same impact determination

VEC	No Action Alternative	Alternative 1	Alternative 2	Alternative 3
Land Use (Recreation)	Long-term, <u>minor adverse</u> impacts on recreation from continued training at the GHMTA.	Direct: Long-term, <u>moderate adverse</u> impacts on recreational use from reduced availability of up to 14 training compartments (13,277 acres) during construction, operation, and maintenance.	<i>Direct: Long-term, <u>minor adverse</u> impacts on recreational use from reduced availability of up to three training compartments (4,870 acres) during construction, operation, and maintenance.</i>	Direct: Long-term, minor adverse impacts on recreational use from reduced availability of up to three training compartments (3,726 acres), which currently experience the highest recreational use, during construction and training.
		Direct: Long-term, <u>negligible adverse</u> effect on hunting quality from changes in species composition in training compartments.		
		Direct: Long-term, <u>negligible to minor</u> adverse impact on hunting suitability, including fishing, from habitat conversion.		
		Direct: Long-term, <u>negligible beneficial</u> impact on recreational site access from new infrastructure and trails.	Direct: Long-term, <u>minor beneficial</u> impact on recreational site access from construction of 13 miles of new infrastructure and trails.	Direct: Long-term, <u>minor beneficial</u> impact on recreational site access from construction of <u>10 miles</u> of new infrastructure and trails.
		Indirect: Long-term, <u>minor adverse</u> impacts on recreation outside the proposed HOMMTA from increased hunting stress due to reduced access to <u>14 training compartments</u> .	Indirect: Long-term, <u>minor adverse</u> impacts on recreation outside the proposed HOMMTA from increased hunting stress due to reduced access to <u>3 training compartments</u> .	Indirect: Long-term, <u>minor adverse</u> impacts on recreation outside the proposed HOMMTA from increased hunting stress due to reduced access to <u>3 training compartments</u> .

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Land Use (Recreation) (cont.)	(see above)	Indirect: Long-term, <u>minor adverse impacts on hunting suitability outside the proposed HOMMTA from construction, operation, and maintenance disturbance.</u>	Indirect: Long-term, <u>minor adverse impacts on hunting suitability outside the proposed HOMMTA from construction, operation, and maintenance disturbance.</u>	<i>Indirect: Long-term, <u>minor adverse impacts on hunting suitability outside the proposed HOMMTA from construction, operation, and maintenance disturbance.</u></i>
Air Quality	Long-term, <u>negligible to minor adverse impacts on air quality from existing conditions in the Action Alternatives and the GHMTA.</u>	Direct: Short-term, <u>minor adverse impacts on emissions from use of construction equipment and vehicles.</u>	<i>Direct: Short-term, <u>minor adverse impacts on emissions from use of construction equipment and vehicles.</u></i>	Direct: Short-term, <u>moderate adverse impacts on emissions from use of construction equipment and vehicles and the proximity of down-wind sensitive receptors.</u>
		Direct: Long-term, <u>minor adverse impacts on emissions from heavy off-road maneuver training on 3,200 acres of maneuver land and 25 miles of unpaved roads.</u>	<i>Direct: Long-term, <u>minor adverse impacts on emissions from heavy off-road maneuver training on 2,700 acres of open maneuver land and 21 miles of unpaved roads.</u></i>	Direct: Long-term, <u>moderate adverse impacts on emissions from heavy off-road maneuver training on 1,500 acres of open maneuver land and 10 miles of unpaved roads, and the proximity of down-wind sensitive receptors.</u>
		<i>Direct: Long-term, <u>minor adverse impacts on emissions from use of maintenance equipment and vehicles, and reduced emissions from prescribed burns.</u></i>	Direct: Long-term, <u>minor adverse impacts on emissions from use of maintenance equipment and vehicles, and reduced emissions from prescribed burns.</u>	Direct: Long-term, <u>minor adverse impacts on emissions from use of maintenance equipment and vehicles, and reduced emissions from prescribed burns.</u>

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Air Quality (cont.)	(see above)	Indirect: Short- and long-term, <u>minor adverse</u> effects on air quality from emissions traveling offsite during construction, operation, and maintenance of the Proposed Action.	Indirect: Short- and long-term, <u>minor adverse</u> effects on air quality from emissions traveling offsite during construction, operation, and maintenance of the Proposed Action.	Indirect: Short- and long-term, <u>moderate adverse</u> effects on air quality from emissions traveling offsite during construction, operation, and maintenance of the Proposed Action due to the proximity of down-wind, off-Post receptors.
Noise	Long-term, <u>minor to moderate adverse</u> impacts on noise in areas within 1,400 feet of the GHMTA from continued heavy maneuver training.	Direct: Short-term, <u>negligible adverse</u> impacts due to construction noise experienced on site from use of cranes, concrete trucks, diesel generators, and heavy construction vehicles.		Direct: Short-term, <u>minor adverse</u> impacts due to construction noise experienced by sensitive noise receptors within 1,400 feet of construction equipment and vehicles.
	Long-term, <u>negligible to minor adverse</u> impacts on noise at the Installation from current activities.	Direct: Long-term, <u>negligible adverse</u> impacts from intermittent noise generated by military vehicle use during training activities.		Direct: Long-term, <u>minor to moderate adverse</u> impacts on sensitive noise receptors within 1,400 feet of intermittent noise generated by military vehicle use during training.
		Direct: Long-term, <u>negligible adverse</u> impacts from intermittent noise generated by maintenance activities.		Direct: Long-term, <u>minor adverse</u> impacts on sensitive noise receptors within 1,400 feet from intermittent noise generated by maintenance activities.

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Noise (cont.)	(see above)	Indirect: Long-term <u>reduction to minor adverse levels</u> of noise impacts within 1,400 feet of the GHMTA from reduced training activity.			
Soils and Topography	Long-term, <u>minor adverse</u> impacts on soils from continued disturbance and use of the GHMTA.	Direct: Short-term, <u>minor to moderate adverse</u> impacts on soils from construction disturbance of <u>1,056 acres of moderately erodible soils</u> and 1 acre of <u>highly erodible soils</u> .	Direct: Short-term, <u>minor to moderate adverse impacts on soils from construction disturbance of 1,530 acres of moderately erodible soils and 63 acres of highly erodible soils.</u>	Direct: Short-term, <u>minor adverse</u> impacts on soils from construction disturbance of <u>215 acres of moderately erodible soils</u> and 1 acre of <u>highly erodible soils</u> .	
		Direct: Short-term, <u>negligible to minor adverse impacts on soils from soil compaction during construction.</u>	Direct: Short-term, <u>negligible to minor adverse</u> impacts on soils from soil compaction during construction.	<i>Direct: Short-term, <u>negligible to minor adverse impacts on soils from soil compaction during construction.</u></i>	
		<i>Direct: Long-term, <u>minor to moderate adverse impacts on soils from disturbance and compaction during heavy maneuver training.</u></i>	Direct: Long-term, <u>moderate adverse</u> impacts on soils from disturbance and compaction during heavy maneuver training.	Direct: Long-term, <u>moderate adverse impacts on soils from disturbance and compaction during heavy maneuver training.</u>	
		<i>Direct: Long-term, <u>negligible adverse impacts on erosion and runoff from new impervious surface.</u></i>	Direct: Long-term, <u>negligible adverse impacts on erosion and runoff from new impervious surface.</u>	Direct: Long-term, <u>negligible adverse</u> impacts on erosion and runoff from new impervious surface.	
		Indirect: Long-term <u>reduction in existing minor adverse</u> impacts on soils in the GHMTA from a reduced training load.			

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Soils and Topography (cont.)	(see above)	<i>Indirect: Short- and long-term, <u>minor adverse impacts on soils from construction, operation, and maintenance activities that could result in increased air and water quality effects outside the proposed HOMMTA.</u></i>	Indirect: Short- and long-term, <u>minor adverse impacts on soils from construction, operation, and maintenance activities that could result in increased air and water quality effects outside the proposed HOMMTA.</u>	Indirect: Short- and long-term, <u>minor adverse impacts on soils from construction, operation, and maintenance activities that could result in increased air and water quality effects outside the proposed HOMMTA.</u>
Water Resources	Long-term, <u>minor adverse impacts on water resources in the GHMTA from continued off-road heavy maneuver training.</u>	Direct: Short-term, <u>minor adverse impacts on 3.4 acres of wetlands, 1,500 LF of streams, and 2.1 acres of regulated stream buffer during construction.</u>	Direct: Short-term, <u>minor adverse impacts on 4.1 acres of wetlands, 1,600 LF of streams, and 5 acres of regulated stream buffer during construction.</u>	<i>Direct: Short-term, <u>minor adverse impacts on 12.5 acres of wetlands, 1,350 LF of streams, and 3.3 acres of regulated stream buffer during construction.</u></i>
		Direct: Long-term, <u>minor adverse impacts on 5.9 acres of wetlands, 3,200 LF of streams, and 4.2 acres of regulated stream buffer from construction.</u>	Direct: Long-term, <u>minor adverse impacts on 2.0 acres of wetlands, 1,600 LF of streams, and 2.6 acres of regulated stream buffer from construction.</u>	<i>Direct: Long-term, <u>minor adverse impacts on 6.3 acres of wetlands, 1,350 LF of streams, and 1.7 acres of regulated stream buffer from construction.</u></i>
		<i>Direct: Short- and long-term, <u>minor adverse impacts on water quality from increased runoff, sedimentation, and accidental release during construction, operation, and maintenance.</u></i>	Direct: Short- and long-term, <u>minor adverse impacts on water quality from increased runoff, sedimentation, and accidental release during construction, operation, and maintenance.</u>	Direct: Short- and long-term, <u>minor adverse impacts on water quality from increased runoff, sedimentation, and accidental release during construction, operation, and maintenance.</u>

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Water Resources (cont.)	Long-term, <u>negligible adverse</u> impacts on water resources from continuation of current activities in the Action Alternative locations.	Direct: Short-term, <u>minor adverse</u> impacts on an impaired stream from increased runoff and sedimentation during construction.	<i>Direct: Short-term, <u>negligible adverse</u> impacts on an impaired stream from increased runoff and sedimentation during construction.</i>	Direct: Short-term, <u>minor adverse</u> impacts on an impaired stream from increased runoff and sedimentation during construction.
		Direct: Short- and long-term, <u>negligible adverse</u> impacts on floodplains from vegetation removal and training in <u>44 acres of 100-year floodplains</u> .	<i>Direct: Short- and long-term, <u>negligible adverse</u> impacts on floodplains from vegetation removal and training in <u>17 acres of 100-year floodplains</u>.</i>	No impacts on floodplains.
		Indirect: Short- and long-term, <u>negligible adverse</u> impacts on downstream water resources from sedimentation during construction, operation, and maintenance activities.		
		Indirect: Long-term <u>reduction in existing minor adverse</u> impacts on water resources at the GHMTA from a reduced training load.		
Biological Resources	Long-term, <u>minor adverse</u> impacts on existing vegetation, non-special status fish and wildlife, and bald eagles from continued operation at the GHMTA.	Direct: Short- and long-term, <u>moderate adverse</u> impacts on vegetation communities from conversion of <u>~3,200 acres of vegetation</u>.	Direct: Short- and long-term, <u>moderate adverse</u> impacts on vegetation communities from conversion of <u>~2,700 acres of vegetation</u> .	<i>Direct: Short- and long-term, <u>moderate adverse</u> impacts on vegetation communities from conversion of <u>~1,500 acres of vegetation</u>.</i>
		<i>Direct: Long-term, <u>significant adverse</u> impact on Unique Ecological Areas (UEAs) from direct disturbance and permanent degradation of <u>~101 acres</u>.</i>	Direct: Long-term, <u>significant adverse</u> impact on UEAs from direct disturbance and permanent degradation of <u>~184 acres</u> .	Direct: Long-term, <u>significant adverse</u> impact on UEAs from direct disturbance and permanent degradation of <u>~438 acres</u>.

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Biological Resources (cont.)	(see above)	Direct: Short- and long-term, <u>minor</u> adverse impacts on wildlife from land disturbance, displacement, and potential loss of life during construction, operation, and maintenance.	Direct: Short- and long-term, <u>minor</u> adverse impacts on wildlife from land disturbance, displacement, and potential loss of life during construction, operation, and maintenance.	<i>Direct: Short- and long-term, <u>minor</u> adverse impacts on wildlife from land disturbance, displacement, and potential loss of life during construction, operation, and maintenance.</i>
		<i>Direct: Long-term, <u>moderate</u> adverse impact on wildlife from change in species composition following construction.</i>	Direct: Long-term, <u>moderate</u> adverse impact on wildlife from change in species composition following construction.	Direct: Long-term, <u>moderate</u> adverse impact on wildlife from change in species composition following construction.
		Direct: Short- and long-term, <u>minor</u> adverse impact on fish and aquatic organisms due to construction disturbance resulting in water quality degradation.	<i>Direct: Short- and long-term, <u>minor</u> adverse impact on fish and aquatic organisms due to construction disturbance resulting in water quality degradation.</i>	Direct: Short- and long-term, <u>minor</u> adverse impact on fish and aquatic organisms due to construction disturbance resulting in water quality degradation.
		Direct: Long-term, <u>moderate</u> adverse impacts on Federal-listed and candidate species from take of <u>11 active red-cockaded woodpecker (RCW) clusters and disturbance of less than 328 active gopher tortoise burrows.</u>	<i>Direct: Long-term, <u>moderate</u> adverse impacts on Federal-listed and Candidate species from take of <u>2 RCW clusters and disturbance of 85 active gopher tortoise burrows.</u></i>	Direct: Long-term, <u>moderate</u> adverse impacts on Federal-listed and Candidate species from take of <u>12 RCW clusters and disturbance of 174 active gopher tortoise burrows.</u>

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VEC	No Action Alternative	Alternative 1	Alternative 2	Alternative 3
Biological Resources (cont.)	(see above)	Direct: Short- and long-term, moderate adverse impacts on special status (non-Federal-listed) species from temporary construction displacement or mortality.	Direct: Short- and long-term, moderate adverse impacts on special status (non-Federal-listed) species from temporary construction displacement or mortality.	<i>Direct: Short- and long-term, moderate adverse impacts on special status (non-Federal-listed) species from temporary construction displacement or mortality.</i>
		Direct: Short- and long-term, minor adverse effects on migratory birds from construction disturbance.	Direct: Short- and long-term, minor adverse effects on migratory birds from construction disturbance.	<i>Direct: Short- and long-term, minor adverse effects on migratory birds from construction disturbance.</i>
		Direct: Short- and long-term, minor adverse effects on bald eagles from construction disturbance.	<i>Direct: Short- and long-term, minor adverse effects on bald eagles from construction disturbance.</i>	No impacts on bald eagles.
		Indirect: Short- and long-term, negligible to minor adverse effect on offsite vegetation from construction, operation, and maintenance disturbance.	Indirect: Short- and long-term, negligible to minor adverse effect on offsite vegetation from construction, operation, and maintenance disturbance.	<i>Indirect: Short- and long-term, negligible to minor adverse effect on offsite vegetation from construction, operation, and maintenance disturbance.</i>
		Indirect: Long-term, negligible adverse impact on vegetation from potential changes in the fire regime.	Indirect: Long-term, negligible adverse impact on vegetation from potential changes in the fire regime.	<i>Indirect: Long-term, negligible adverse impact on vegetation from potential changes in the fire regime.</i>

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Biological Resources (cont.)	(see above)	Indirect: Long-term, <u>minor adverse</u> impacts on vegetation from spread of invasive species.	Indirect: Long-term, <u>minor adverse</u> impacts on vegetation from spread of invasive species.	<i>Indirect: Long-term, <u>minor adverse</u> impacts on vegetation from spread of invasive species.</i>
		Indirect: Short- and long-term, <u>negligible adverse</u> effects on UEAs offsite from soil erosion and sedimentation during construction and operation/maintenance activities.	Indirect: Short- and long-term, <u>negligible adverse</u> effects on UEAs offsite from soil erosion and sedimentation during construction and operation/maintenance activities.	<i>Indirect: Short- and long-term, <u>negligible adverse</u> effects on UEAs offsite from soil erosion and sedimentation during construction and operation/maintenance activities.</i>
		Indirect: Short- and long-term, <u>minor adverse</u> effects to offsite fish and wildlife from soil erosion and downstream sedimentation into offsite areas.	Indirect: Short- and long-term, <u>minor adverse</u> effects to offsite fish and wildlife from soil erosion and downstream sedimentation into offsite areas.	<i>Indirect: Short- and long-term, <u>minor adverse</u> effects to offsite fish and wildlife from soil erosion and downstream sedimentation into offsite areas.</i>
Cultural Resources	No impacts.	Direct: Long-term, <u>minor adverse</u> impacts on cultural resources knowledge repository from anticipated excavation (i.e., data recovery mitigation) of archaeological sites.	<i>Direct: Long-term, <u>minor adverse</u> impacts on cultural resources knowledge repository from anticipated excavation (i.e., data recovery mitigation) of archaeological sites.</i>	Direct: Long-term, <u>minor adverse</u> impacts on cultural resources knowledge repository from anticipated excavation (i.e., data recovery mitigation) of archaeological sites.
		Direct: Long-term, <u>negligible adverse</u> impacts on four cemeteries from noise during construction, operation, and maintenance activities.	Direct: Long-term, <u>negligible adverse</u> impacts on two cemeteries from noise during construction, operation, and maintenance activities.	No impacts on cemeteries.

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Cultural Resources (cont.)	(see above)	Direct: Long-term, <u>negligible adverse</u> impacts on potential existing populations of a plant important to Tribes.			
		Direct: Short- and long-term, <u>minor to moderate adverse</u> impacts on up to 1 Property of Traditional Religious and Cultural Importance (PTRCI) from nearby disturbance during construction, operation, and maintenance.			
		Direct: Long-term, <u>minor adverse</u> impacts on inadvertent cultural discoveries.			
Socioeconomics	Long-term, <u>minor beneficial</u> impacts from continued expenditures and jobs associated with the GHMTA.	<i>Direct: Short-term, <u>minor beneficial</u> impact on job creation, earnings, and economic impact from creation of <u>245 direct job-years</u> and <u>projected combined direct earnings of over \$15.7 million</u> during construction.</i>	Direct: Short-term, <u>minor beneficial</u> impact on job creation, earnings, and economic impact from creation of <u>276 direct job-years</u> and <u>project combined earnings of \$17.7 million</u> during construction.	Direct: Short-term, <u>minor beneficial</u> impact on job creation, earnings, and economic impact from creation of <u>253 direct job-years</u> and <u>projected combined direct earnings of \$16.2 million</u> during construction.	
		Direct: Long-term, <u>minor beneficial</u> impact on job creation, earnings, and economic impact from creation of 31 job-years and \$2.4 million projected earnings during the first year of maintenance, and 27 job-years and \$2.1 million in earnings during subsequent years of maintenance.			
		<i>Indirect: Short-term, <u>minor beneficial</u> impact on the economy from indirect employment (<u>211 job-years</u>) and <u>projected combined indirect earnings of over \$8.9 million</u> during construction.</i>	Indirect: Short-term, <u>minor beneficial</u> impact on the economy from indirect employment (<u>238 job-years</u>) and <u>projected combined indirect earnings of \$10.1 million</u> during construction.	Indirect: Short-term, <u>minor beneficial</u> impact on the economy from indirect employment (<u>219 job-years</u>) and <u>projected combined indirect earnings of over \$9.2 million</u> during construction.	
		Indirect: Long-term, <u>minor beneficial</u> impact on the economy from the creation of 21 job-years in the first year of maintenance and 17 job-years annually thereafter.			

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Socioeconomics (cont.)	(see above)	No impacts on EJ.	Indirect: Short- and long-term, <u>negligible</u> adverse impacts on EJ from spread of airborne fugitive dust to low-income residences located over 0.5 mile from the Installation boundary during construction, operation, and maintenance.	Indirect: Short- and long-term, <u>minor to moderate</u> adverse impacts on EJ from increased noise levels and spread of airborne fugitive dust to 11 off-Post residences near the Installation boundary during construction, operation, and maintenance.
Infrastructure	Long-term, <u>negligible</u> adverse impacts on traffic and transportation near the GHMTA from continued heavy maneuver training activities.	Direct: Short-term, <u>minor</u> adverse impacts on utilities from electric service disruption during connection transfer.	No impacts on utilities.	Direct: Short-term, <u>minor</u> adverse impacts on utilities from electric service disruption during connection transfer.
		Direct: Long-term, <u>minor beneficial</u> impacts to electrical system integrity from burying utility lines.	No impacts on utilities.	Direct: Long-term, <u>minor beneficial</u> impacts to electrical system integrity from burying utility lines
		Direct: Short-term, <u>minor</u> adverse impacts on roadways from road closures and traffic disruption during construction.	<i>Direct: Short-term, <u>minor</u> adverse impacts on roadways from road closures and traffic disruption during construction in a low-trafficked ROI.</i>	Direct: Short-term, <u>minor</u> adverse impacts on roadways from road closures and traffic disruption during construction.
		<i>Direct: Long-term, <u>minor beneficial</u> impacts from 2 miles of improved roads and 15 new tank crossing locations.</i>	Long-term, <u>minor beneficial</u> impacts from 9 miles of improved roads and 13 miles of new trails.	Long-term, <u>minor beneficial</u> impacts from 8 miles of improved roads and 10 miles of new trails.

Table 1: Comparative Analysis of Impacts Between the Alternatives

Key:

Green = Beneficial impact	Red = Significant adverse impact
Yellow = Negligible to minor adverse impact	Bolded impacts = greater impact among the Alternatives with same impact determination
Orange = Moderate adverse impact	<i>Italicized impacts</i> = lower impact among the Alternatives with same impact determination

VEC	No Action Alternative	Alternative 1	Alternative 2	Alternative 3
Infrastructure (cont.)	(see above)	Direct: Long-term, <u>minor adverse</u> impacts on light and heavy vehicle usage and traffic in the ROI during operation and maintenance.	<i>Direct: Long-term, <u>minor adverse</u> impacts on light and heavy vehicle usage and traffic in the ROI during operation and maintenance.</i>	Direct: Long-term, <u>minor adverse</u> impacts on light and heavy vehicle usage and traffic in the ROI during operation and maintenance.
		Direct and Indirect: Long-term, <u>minor adverse</u> impacts on traffic flow on the Installation.	<i>Direct and Indirect: Long-term, <u>minor adverse</u> impacts on traffic flow on the Installation.</i>	Direct and Indirect: Long-term, <u>minor adverse</u> impacts on traffic flow on the Installation.
		Indirect: Short- and long-term, <u>negligible adverse</u> impacts on roadways leading to the Installation from commuting workers during construction and maintenance.	<i>Indirect: Short- and long-term, <u>negligible adverse</u> impacts on roadways leading to the Installation from commuting workers during construction and maintenance.</i>	Indirect: Short- and long-term, <u>negligible adverse</u> impacts on roadways leading to the Installation from commuting workers during construction and maintenance.
Hazardous and Toxic Materials and Waste	Long-term, <u>minor adverse</u> impacts on HTMW use, potential release, and disposal at the GHMTA.	Direct: Short- and long-term, <u>minor adverse</u> impacts from use, storage, disposal, and transport of HTMW, including potential spills, during construction, operation, and maintenance activities.		
		Direct: Short- and long-term, <u>minor adverse</u> impacts from inadvertent discovery of existing contamination during construction, operation, and maintenance activities.		

Table 1: Comparative Analysis of Impacts Between the Alternatives

Key:

Green = Beneficial impact	Red = Significant adverse impact
Yellow = Negligible to minor adverse impact	Bolded impacts = greater impact among the Alternatives with same impact determination
Orange = Moderate adverse impact	<i>Italicized impacts</i> = lower impact among the Alternatives with same impact determination

VEC	No Action Alternative	Alternative 1	Alternative 2	Alternative 3
Hazardous and Toxic Materials and Waste (cont.)	(see above)	Indirect: Short- and long-term, <u>minor adverse</u> impacts from potential down-gradient release of HTMW during construction activities, operation, and maintenance.	Indirect: Short- and long-term, <u>minor adverse</u> impacts from potential down-gradient release of HTMW during construction, operation, and maintenance activities due to drainage to off-Post lands.	Indirect: Short- and long-term, <u>minor adverse</u> impacts from potential down-gradient release of HTMW during construction, operation, and maintenance activities.
		Indirect: Long-term <u>reduction in existing minor adverse</u> impacts from reduced use of hazardous materials at the GHMTA.		

Overall, the Final EIS found that, with one exception, all VECs would experience less-than-significant (i.e., negligible, minor, or moderate) adverse or beneficial impacts from construction, operation, and/or maintenance of either Alternatives 1, 2, or 3. The No Action Alternative would also be expected to have no or less-than-significant adverse impacts on all VECs except socioeconomics, which would have minor beneficial impacts.

The only potentially significant adverse impacts that may occur from the Proposed Action, under any Action Alternative, would be to Unique Ecological Areas (UEAs), a subcategory of biological resources. Specifically, construction of the proposed HOMMTA could result in destruction or degradation of UEAs, non-regulated management areas on the Installation in which Fort Benning has identified unique or rare ecological characteristics and ecological integrity. For Action Alternatives, these potentially significant adverse impacts would be greatest under Alternative 3 and least under Alternative 1.

Concurrent with the NEPA process, the Army formally consulted with the US Fish and Wildlife Service (USFWS) under Section 7 of the Endangered Species Act. The Army prepared a Biological Assessment to analyze potential impacts to RCWs (a federally endangered species¹) that could result from Alternative 1 (i.e., the Preferred Alternative). Alternative 1 would take 11 active RCW clusters. As Fort Benning would remain above its RCW population goal even with implementation of Alternative 1, Alternative 1 would not adversely affect the recovery of this species; as such, Alternative 1 would have moderate adverse impacts to Fort Benning's RCW population. The USFWS issued its Biological Opinion regarding these potential impacts and appropriate mitigation measures, finding no jeopardy to the RCW from the action.

The Final EIS also includes a detailed analysis of potential cumulative impacts that could result from each Alternative when considered in conjunction with past, present, and reasonably foreseeable future actions within the Proposed Action's ROI for each VEC. Generally, the Action Alternatives would result in similar cumulative impacts, as all Action Alternatives would contribute similar incremental effects to those effects of other projects. Minor to moderate adverse

¹ On September 25, 2020, the USFWS announced its proposal to downlist the RCW to "threatened" status. If needed, the Army will re-initiate consultation with the USFWS for this species; however, because Federal protections for threatened species are generally less than those for endangered species, the Army does not anticipate that the BO conclusions would change.

cumulative impacts to VECs would occur primarily from overlapping construction activities in proportion to the size of the Alternative (i.e., greatest for Alternative 1 and least for Alternative 3). Potentially significant adverse cumulative effects to UEAs would occur under all Action Alternatives in proportion to the UEA impacts within the Action Alternatives (i.e., greatest under Alternative 3 and least under Alternative 1).

6.0 Mitigation

Potential adverse impacts that could result from the Proposed Action have been reduced to the extent feasible through avoidance and environmentally sensitive design. This “mitigation by design” (e.g., incorporation of buffers around wetlands and cemeteries into the concept drawings for each Alternative) was implemented when identifying reasonable HOMMTA Action Alternative locations, and when identifying preliminary heavy off-road maneuver areas within each Action Alternative footprint. Additionally, as noted in Section 4.0, the Army has identified RCMs and EPMS that are included as part of the Proposed Action in order to reduce potential adverse impacts further. For VECs that could still be adversely impacted even with implementation of sensitive design, RCMs, and EPMS, the Final EIS identified additional mitigation measures that would minimize, avoid, or compensate for these adverse impacts to each VEC, as appropriate, under each Action Alternative.

For Alternative 1, the Army also prepared a Draft Mitigation and Monitoring Plan (see Appendix J of the Final EIS) to guide the implementation, monitoring, and evaluation of these mitigation measures. This Draft Mitigation and Monitoring Plan is incorporated into this ROD by reference; the Army will finalize this Mitigation and Monitoring Plan during the design phase of the Proposed Action to ensure that it fully addresses each selected mitigation measure.

All practicable means to avoid or minimize environmental harm from the Selected Alternative have been adopted. The Army formally commits to implement and monitor each mitigation measure listed below and further detailed in the Draft Mitigation and Monitoring Plan:

Water Resources

- Incorporate into the final design, and throughout operation and maintenance, avoidance of all 100-year floodplains within Alternative 1 when feasible.

- Maintain surface water buffers from heavy maneuver training activities that exceed the 25- to 100-foot widths anticipated as part of the Proposed Action, depending on site-specific resources and conditions.
- Implement proactive, long-term erosion control measures in areas where sedimentation is most likely (in addition to the Integrated Training Area Management program).

Biological Resources

- Re-vegetate disturbed soils with plant species on Fort Benning’s approved plant list, to the extent feasible, in order to reduce the adverse impacts of vegetation removal.
- Where practical, use erosion control materials that are biodegradable and/or mobile to reduce their longevity in the environment. Remove erosion control measures following construction when not needed for long-term soil stabilization.
- Avoid construction within 200 feet of clusters during the red-cockaded woodpecker (federally endangered) nesting season (April through July).
- If gopher tortoises are located during construction or maintenance of the proposed HOMMTA, avoid them to the extent feasible; if avoidance is not feasible, then relocate them in accordance with the *Management Guidelines for the Gopher Tortoise on Army Installations* and Fort Benning’s INRMP.

Cultural Resources

- Establish a 50-foot buffer from all vehicle, digging, or other disturbance around National Register of Historic Places (NRHP)-eligible archaeological site footprints (including, as applicable, the PTRCI) in the field prior to HOMMTA construction by installing Seibert Stake reflectors, along with “Sensitive Area” signage, at 45-foot intervals. Existing vegetation would be retained within these buffers as barriers to vehicle traffic, and boulders would be emplaced at 6-foot intervals, where needed, to supplement vegetative barriers.
- Monitor NRHP-eligible archaeological sites and, as applicable, the PTRCI routinely throughout the HOMMTA’s lifecycle.

Mitigation measures that the Army considered but will not select as mandatory to implement are listed in the Draft Mitigation and Monitoring Plan as “optional” with explanations of why they are

not practicable. The following mitigation measures are not being adopted because they are not practicable; that is, they are not reasonably feasible and/or would not appreciably add to overall mitigation effectiveness because of other mitigation measures that have been adopted:

Land use (Recreation):

- Redelineate the boundaries of training compartments that are partially included within the proposed HOMMTA to align more closely with the boundary of the HOMMTA.

Soils, and Biological Resources (Vegetation, Fish and Wildlife):

- Plan construction activities to occur in a manner that further reduces the potential for erosion.
- Conduct vegetation removal and land disturbance activities during times of the year with generally lower amounts of precipitation to reduce the risk of erosion.
- Implement stormwater/water quality mitigation measures that would help reduce indirect effects to offsite areas.
- Use a plant important to a Native American Tribe as vegetative barriers to further reduce soil erosion.

Water Resources:

- Plan “rest and rehabilitation” periods, when feasible, and utilize “smart” scheduling to minimize impacts from multiple, sequential training events.
- Avoid conducting off-road heavy maneuver training, except when necessary, during or immediately following inclement weather when potential sedimentation impacts are most likely.

Biological Resources (UEAs):

- Avoid and mark as “off-limits” approximately 5.9 acres of the Upatoi Bluffs UEA and 94.9 acres of the Depression Ponds UEA in Alternative 1 during the formal engineering and subsequent construction and operational phases, plus monitor for encroachments.

Biological Resources (Special Status Species):

- Avoid construction within the nesting season of migratory birds (generally April to August, including spring and summer), if feasible.

The Army will ensure that any HOMMTA design deviations that would impact the Final EIS conclusions will be evaluated for the appropriate level of NEPA analysis, including any revisions to required mitigation. Additionally, during the design phase, the Army will further evaluate the mitigation measures identified as “optional” in the Draft Mitigation and Monitoring Plan and determine whether to adopt them. If an “optional” mitigation measure is adopted, it will be included in the Final Mitigation and Monitoring Plan or a mitigation report, as applicable.

7.0 Decision

On behalf of the Army, I have decided to proceed with Alternative 1 to implement the Proposed Action.

The Army identified Alternative 1 as its Preferred Alternative in the Draft and Final EIS because it provides the most preferable size and configuration to enable high-quality heavy off-road mounted maneuver training. While the Army could satisfy the purpose of and need for the Proposed Action by implementing Alternative 2 or 3, training would be more restricted by the smaller sizes and existing safety and environmental constraints (e.g., slopes, streams, and wetlands) within those locations that would limit the abilities of soldiers to conduct heavy off-road mounted maneuver training in a realistic training environment. The No Action Alternative would not satisfy the purpose of and need for the Proposed Action.

Based on the Proposed Action’s potential impacts to the natural and human environment summarized in Table 1, the No Action Alternative is the Environmentally Preferred Alternative. Under the No Action Alternative, a new HOMMTA would not be constructed; existing operational

and maintenance activities would continue to occur in the GHMTA, resulting in minor adverse impacts to most VECs.

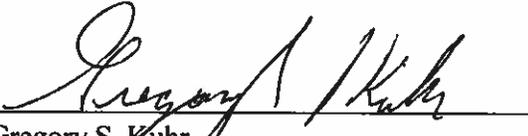
Alternative 1 is the largest and would entail the most land disturbance, which often correlates with more adverse impacts. This is not the case here. Alternative 3, the smallest Alternative by size, would result in comparable or greater adverse impacts to numerous important resources compared to Alternative 1, including to wetlands, impaired streams, UEAs, RCW clusters, and NRHP-eligible archaeological sites. Importantly, Alternative 3 is located on the Installation boundary near 12 off-Post sensitive receptors in an Environmental Justice community that could experience adverse air quality and noise impacts. Therefore, among Action Alternatives, Alternative 2 is the Environmentally Preferred Alternative, as it entails less land disturbance (by acreage) than Alternative 1 and fewer impacts to the aforementioned resources than both Alternatives 1 and 3. While Alternative 2 is also located near the Installation boundary, it is not close to any off-Post sensitive receptors.

The Army received 6 comments during the Final EIS waiting period. The comments dealt with the following subjects related to the Proposed Action/Preferred Alternative: noise and smoke impacts, cemetery assessment and avoidance, training area sustainability, military land and resource use, finalizing the mitigation plan, and location of the HOMMTA. These comments have been made part of the administrative record for this action. The comments do not present information that constitutes significant new circumstances or information relevant to environmental concerns that would require supplementation of the EIS. The Army took these comments into account in making its decision. The Army also considered the comments received on the Final EIS in finalizing the Finding of No Practicable Alternative (FONPA) for wetland and/or floodplain impacts and determined no revisions were warranted; therefore the final FONPA is incorporated by reference into this ROD.

In summary, I have considered the results of the analysis presented in the Final EIS, including the supporting studies and consultation with Native American Tribes and Federal, State, and local agencies, as well as the comments received from the public during formal review and comment periods. I have also evaluated our national defense needs, Fort Benning's mission requirements, and the purpose of and need for the Proposed Action to guide my decision to select Alternative 1

for implementation. The GHMTA, even with recent improvements, does not provide enough contiguous heavy maneuver area to meet the Army's training needs. The increased maneuver training requirements of the MCoE and Fort Benning's tenant units can best be met by establishing a new HOMMTA with sufficient contiguous area to complete required cross-domain movement and maneuver training.

I gave special consideration to the effect of Alternative 1 on all VECs and also accounted for the training limitations that would accompany selection of either the No Action Alternative or Alternatives 2 or 3 for implementation. Implementation of Alternative 1 strikes a proper balance between protecting the environment and achieving the Army's requirements. My decision to select Alternative 1 is based on my determination that this best meets the Army's training needs while balancing Fort Benning's obligations for stewardship of the environment.



Gregory S. Kuhr
G4 Director
US Army Installation Management Command

Date 1 July 2021